

Gregory G. Barnett, Esq. (GGB-3751)  
CASEY & BARNETT, LLC  
317 Madison Avenue, 21<sup>st</sup> Floor  
New York, New York 10017  
(212) 286-0225  
Attorneys for defendant, Great White Fleet Ltd.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
BOSSE SHIPPING LTD.,

Plaintiff,

- against -

GREAT WHITE FLEET, LTD.,

Defendant.

-----X

**NOTICE OF MOTION TO  
DISMISS COMPLAINT AND  
VACATE ATTACHMENT**

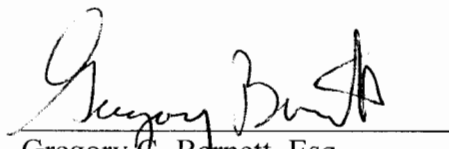
07 CV 7221 (RJS)

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Gregory G. Barnett, dated September 5, 2007, together with the exhibits annexed thereto, the accompanying Affidavit of Adrian Charles Hardingham, dated September 5, 2007, together with the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings herein, defendant Great White Fleet Ltd. will apply to the Southern District of New York for an Order pursuant to Rule E(4)(f) and Rule E(6) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure granting their request to dismiss the Complaint and vacate the attachment of funds in the amount of \$1,485,934.85 or in the alternative, to reduce the

amount of the attachment to an amount commensurate with plaintiff's provable damage ,  
and for such other and further relief as this Honorable Court deems proper.

Dated: New York, New York  
September 5, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory Barnett", written over a horizontal line.

Gregory G. Barnett, Esq.  
Casey & Barnett, LLC  
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New York, New York 10017  
212-286-0225  
Counsel for Great White Fleet Ltd.

**CERTIFICATE OF SERVICE**

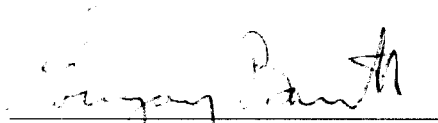
***I hereby certify that a copy of defendant's Notice of Motion and Memorandum in Support of Motion with attachments was served on the parties listed below by placing copies in the United States mail with proper postage on September 5, 2007.***

Michael E. Unger  
Freehill, Hogan & Mahar LLP  
80 Pine Street  
New York, NY 10005-1759

**CASEY & BARNETT LLC**

Counsel for defendant, Great White  
Fleet Ltd.

By:

A handwritten signature in dark ink, appearing to read "Gregory G. Barnett", is written over a horizontal line.

Gregory G. Barnett, Esq.  
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